

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

NOTICE OF AGENDA FOR HEARING ON JULY 31, 2025 AT 10:30 A.M. (ET)

**This proceeding will be conducted in-person.
Delaware counsel is expected to appear in person and all
other parties are permitted to appear remotely via Zoom.**

**Please refer to Judge Shannon's Chambers Procedures
(<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the
Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)
for information on who may participate remotely, the method of allowed
participation (video or audio), Judge Shannon's expectations of
remote participants, and the advance registration requirements.**

**Registration is required by 4:00 p.m. (ET) the business day
before the hearing unless otherwise noticed using the
eCourtAppearances tool available on the Court's website.**

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

MATTERS GOING FORWARD:

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 8](#) – filed on March 11, 2025]

Response/Objection Deadline: July 23, 2025 at 4:00 p.m. (ET).

Responses Received:

- i. Omnibus Limited Objection and Reservation of Rights of Mohammad Honarkar and 4G Wireless, Inc. to First Day Motions [[Docket No. 31](#) – filed on March 13, 2025]
- ii. Objection of Enterprise Bank & Trust to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 40](#) – filed on March 13, 2025]
- iii. Lone Oak Fund, LLC's Limited Objection and Reservation of Rights to the Debtors' Motion for Entry of Final Order (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 107](#) – filed on March 24, 2025]
- iv. Wilshire Quinn Income Fund, LLC's Objection to the Debtors' Motion for Entry of Final Order (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 110](#) – filed on March 24, 2025]
- v. Preferred Bank's Objection to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 128](#) – filed on March 26, 2025]

Related Documents:

- a. Notice of Filing of 13 Week Cash Flow Budgets [[Docket No. 135](#) – filed on March 27, 2025]
- b. Amended Declaration of Mark Shinderman in Support of Petitions and First Day Motions [[Docket No. 152](#) – filed on March 28, 2025]

- c. Notice of Filing of Updated FTI Report Dated April 7, 2025 [[Docket No. 207](#) – filed on April 10, 2025]
- d. Ninth Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 684](#) – entered on July 17, 2025]

Status: Depending on the outcome of settlement discussions amongst the parties, the Debtors may submit a further interim order under certification of counsel.

- 2. Motion of Preferred Bank for Relief from the Automatic Stay as to Debtor Tesoro Redlands DE, LLC Pursuant to 11 U.S.C. § 362 [[Docket No. 535](#) – filed on June 13, 2025]

Response/Objection Deadline: July 30, 2025 at 9:30 a.m. (ET).

Responses Received: Informal comments from the Debtors.

Related Documents:

- i. Order Approving Motion for Preferred Bank for Relief from the Automatic Stay [[Docket No. 670](#) – entered on July 15, 2025]
- ii. Order Vacating Preferred Bank Stay Relief Order [[Docket No. 680](#) – entered on July 17, 2025]

Status: This matter is going forward.

- 3. Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [[Docket No. 611](#) – filed on June 27, 2025]

Response/Objection Deadline: June 30, 2025 at 9:30 a.m. (ET).

Responses Received:

- i. Objection of MOM Members to Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases [[Docket No. 620](#) – filed on June 29, 2025]
- ii. Debtors' Statement Regarding Conversion [[Docket No. 621](#) – filed on June 30, 2025]
- iii. Statement of Banc of California With Respect to DIP Motion and Dismissal Motion [[Docket No. 628](#) – filed on June 30, 2025]

- iv. Notice of Filing of Revised Order Pursuant to Section 1112(A) and (B) of the Bankruptcy Code, (I) Converting the Debtors' Cases to Cases Under Chapter 7; (II) Granting the Real Property Lenders Relief from the Automatic Stay; and (III) Granting Related Relief [[Docket No. 646](#) – filed on July 14, 2025]
- v. Response of Enterprise Bank & Trust to Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [[Docket No. 702](#) – filed on July 28, 2025]

Related Documents:

- a. Order Shortening the Notice Period for the Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [[Docket No. 613](#) – entered on June 27, 2025]

Status: This matter is going forward.

Dated: July 29, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Gregory J. Flasser

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